

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CHIARA MEATTELLI,

Petitioner,

CASE NO.

v.

GOOGLE LLC d/b/a YOUTUBE

Respondent.

C. Christopher Newberg (P79025)
RODENHOUSE LAW GROUP P.C.
Attorney for Petitioner
678 Front Avenue NW, Suite 176
Grand Rapids, MI 49504
(616) 451-4000
chris@rodenhouselaw.com

EXHIBIT 3

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**DECLARATION OF C. CHRISTOPHER NEWBERG IN SUPPORT OF ISSUANCE OF
SUBPOENA PURSUANT TO 17 U.S.C. § 512(h)**

I, C. Christopher Newberg, the undersigned, declare that:

1. My law firm, Rodenhouse Law Group PC, has been retained by Chiara Meattelli to effectuate the takedown of infringing content from YouTube.com and discover the identifies of the part(y)(ies) responsible for distributing the infringing content.

2. I am requesting the issuance of the proposed subpoena that would order YouTube to disclose the identity, including the name, physical address(es), IP address(es), telephone number(s), email address(es), payment information, account updates, and account history(y)(ies) of the users responsible for uploading and distributing the content made available on the following pages and URLs:

ChiarAss MeattelLicker - The Trump O Mouth
<https://www.youtube.com/watch?v=rwFXgEVt2yk>

ChiarAss MeattelLicker - L'ossessione per l'ossessione
<https://www.youtube.com/watch?v=R7z4V10tg6g>

ChiarAss MeattelLicker & Nino Tancelo – ChiarAss
<https://www.youtube.com/watch?v=5rDVNzYepYo>

ChiarAss MeattelLicker Show
<https://www.youtube.com/watch?v=Vc3uGN9CsV8>

ChiarAss MeattelLicker - My name is ChiarAss MeattelLicker
https://www.youtube.com/watch?v=5T_H8d0QYrQ

ChiarAss MeattelLicker - The Witch
<https://www.youtube.com/watch?v=xNHgh1ALYpU>

ChiarAss MeattelLicker - Surfing with the Trumps
<https://www.youtube.com/watch?v=ZQBfQTiNKio>

ChiarAss MeattelLicker - Il giorno prima
<https://www.youtube.com/watch?v=vTTIj9Xbqyo>

ChiarAss MeattelLicker – Surreale
https://www.youtube.com/watch?v=_16KhGvXJpI

ChiarAss MeattelLicker - Witchery
<https://www.youtube.com/watch?v=ecJXS2ylLdY>

3. The purpose for which this subpoena is sought is to obtain the identity or identity of the individual or individuals who created, uploaded, and/or distributed Ms. Meattelli's copyrighted images and videos without her authorization. This information will only be used for the purposes of protecting the rights granted to Ms. Meattelli under Title II of the Digital Millennium Copyright Act.

4. I have a good-faith belief that use of the copyrighted materials described above in the manner complained of is not authorized by the copyright owner, its agent, or the law.

5. I declare under penalty of perjury that the information in this notification is accurate and that I am the owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Dated: June 29, 2020

/s/ C. Christopher Newberg
C. Christopher Newberg